

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 18 B 01783
James Wiley and Neshia N Wiley,) HON. Donald R. Cassling
) CHAPTER 13
DEBTORS.)

NOTICE OF MOTION

TO: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603, via electronic court notification;

Ally Financial Inc. f/k/a GMAC Inc., PO Box 130424, Roseville, MN 55113;

Ally Financial Inc. f/k/a GMAC Inc., c/o James M Philbrick, Law Offices of James M. Philbrick, P.C., P. O. Box 351, Mundelein, IL 60060;

PennyMac Loan Services, LLC, c/o Toni Townsend, McCalla Raymer Leibert Pierce, LLC, One North Dearborn, Suite 1300, Suite 1200, Chicago, IL 60602;

Americredit Financial Services, Inc. d/b/a GM Financial, c/o Cari A Kauffman, Sorman & Frankel, Ltd., 180 North LaSalle Street, Suite 2700, Chicago, IL 60601;

See the attached Service List.

Please take notice that on April 2, 2020, at 9:30 a.m., I shall appear before the Honorable Donald R. Cassling in Courtroom 619 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he sent this notice and the attached motion on March 4, 2020, to:

The Chapter 13 Trustee listed above via electronic notice; and

To the attached service list via U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Anthony Kudron
Attorney for Debtors
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625

Case 18-01783 Doc 32 Filed 03/04/20 Entered 03/04/20 15:54:27 Desc Main Document Page 2 of 6
Label Matrix for local noticing (p) JEFFERSON CAPITAL SYSTEMS LLC
0752-1 PO Box 7999
Case 18-01783 SAINT CLOUD MN 56302-7999

Northern District of Illinois
Eastern Division
Wed Mar 4 09:29:16 CST 2020

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021
U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

ALLY FINANCIAL
PO Box 130424
Saint Paul, MN 55113-0004

ARS ACCOUNT RESOLUTION
PO BOX 459079
Fort Lauderdale, FL 33345-9079
ATG CREDIT
1700 W CORTLAND ST STE 2
CHICAGO, IL 60622-1131

Ally Financial
PO Box 130424
Roseville MN 55113-0004

(p) AMERICREDIT FINANCIAL SERVICES DBA GM FINAN
PO BOX 183853
ARLINGTON TX 76096-3853
COMENITY BANK/NWYRK&CO
220 W SCHROCK RD
WESTERVILLE, OH 43081-2873

COMENITYBK/VCF
PO BOX 182789
COLUMBUS, OH 43218-2789

CREDIT MANAGEMENT LP
PO Box 118288
Carrollton, TX 75011-8288
ComEd
1919 Swift Drive
Oak Brook, IL 60523-1502

Commonwealth Edison Company
Bankruptcy Department
1919 Swift Drive
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(p) G L A COLLECTION CO INC
PO BOX 588
GREENSBURG IN 47240-0588
GM Financial
ATT: Mandy Youngblood
PO Box 183853
Arlington, TX 76096-3853

IL Department of Health and Human Services c
100 S Grand Ave
Springfield, IL 62762-1000

ILDHFS
100 S Grand Ave E
Springfield, IL 62762-1000
IRS 1
PO Box 7346
Philadelphia, PA 19101-7346

Illinois Department of Human Services
100 South Grand Ave East
Springfield, IL 62762-0002

Illinois Department of Human Services
IL Attorney General
100 W. Randolph St., 13th Fl.
Chicago, IL 60601-3222
(p) ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY UNIT
PO BOX 19035
SPRINGFIELD IL 62794-9035

MCCALLA RAYMER LEIBERT PIERCE
1 NORTH DEARBORN #12
Chicago, IL 60602-4337

Navient Solutions, LLC. on behalf of
American Student Assistance
PO BOX 16129
St. Paul, MN 55116-0129
Nicor Gas
Po Box 549
Aurora, IL 60507-0549

PALISADES COLLECTION c/o BLATT HASENMILLER L
10 S LASALLE #2200
Chicago, IL 60603-1069

PENNIMAC LOAN SERVICES
Po Box 514387
Los Angeles, CA 90051-4387
(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

PennyMac Loan Services, LLC
Bankruptcy Department
P.O. Box 2010
Moorpark, CA 93020

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

UNITED RESOURCE SYSTEM
3501 S TELLER ST
LAKWOOD, CO 80235-2011

VERIZON WIRELESS
P.O. Box 660108
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Verizon
by American InfoSource LP as agent
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Oklahoma City, OK 73118-7901

Anthony J Kudron
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Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
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Chicago, IL 60604-2027

Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Jefferson Capital Systems, LLC
PO Box 7999
St Cloud, MN 56302-9617

Americredit Financial Services, Inc.
Dba GM Financial
P.O Box 183853
Arlington, TX 76096

(d)Americredit Financial Services, Inc.
dba GM Financial
PO Box 183853
Arlington, TX 76096

GLA COLLECTION CO INC
2630 GLEESON LN
LOUISVILLE, KY 40299

Illinois Department of Revenue Bankruptcy Se
P.O. Box 19035
Springfield, Illinois 62794-9035

(d)Illinois Department of Revenue Bankruptcy
PO Box 19035
Springfield, IL 62794-9035

(d) JEFFERSON CAPITAL SYSTEMS LLC
PO Box 7999
St Cloud MN 56302

PORFOLIO RC
120 Corporate Boulevard
Norfolk, VA 23502

(d)Portfolio Recovery Associates, LLC
Successor to SYNCHRONY BANK
(JC PENNEY)
POB 41067
Norfolk, VA 23541

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 18 B 01783
James Wiley and Neshia N Wiley,) HON. Donald R. Cassling
) CHAPTER 13
DEBTORS.)

MOTION TO MODIFY PLAN

NOW COMES the Debtors, James Wiley and Neshia N Wiley, by and through Debtors' attorneys, The Semrad Law Firm, LLC, and hereby move this Honorable Court to allow the Debtors to modify the Chapter 13 Plan; Debtors state the following:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C §§1334 & 157. This is a core proceeding pursuant to 28 U.S.C. §157.
2. On January 22, 2018, Debtors filed the above captioned voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
3. On March 8, 2018, this Honorable Court entered an Order confirming Debtors' Chapter 13 Plan of reorganization.
4. Pursuant to the confirmed Chapter 13 Plan, Debtors is required to make plan payments to the Chapter 13 Trustee in the amount of \$1,325.00 monthly for 36 months, with secured creditors being paid 100% of his allowed claims, and general unsecured creditors receiving 100.00% of his allowed claims.
5. Debtors' case is running over term because their student loan lenders were included in their case.
6. Section 8.1 of the Debtors' Chapter 13 plan needs to be modified to state that: "Debtors' student loans are currently in deferment and the Trustee shall not pay

any claims filed by the Navient Solutions, LLC.”

7. Debtors respectfully request this Honorable Court enter an Order modifying Section 8.1 of the plan to state that: “Debtors’ student loans serviced by the Navient Solutions, LLC are currently in deferment and the Trustee shall not pay any claims filed by the Navient Solutions, LLC.”
8. Debtors are in a position to proceed with the instant case.
9. Debtors have filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtors pray this Honorable Court for the following relief:

- A. To modify Section 8.1, to state that Debtors’ student loans serviced by the Navient Solutions, LLC are currently in deferment and the Trustee shall not pay the claims filed by the Navient Solutions, LLC any further; and
- B. For such other relief as the Court deems fair and proper.

Respectfully Submitted,
/s/ Anthony Kudron
Attorney for the Debtors
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625